

125 SUMMER STREET BOSTON MA 02110-1618

T 617 443 9292 F 617 443 0004 WWW.BROMSUN.COM

BROMBERG & SUNSTEIN LLP

FILED
CLERKS OFFICE

2006 MAY 24 A 10:27

U.S. DISTRICT COURT
DISTRICT OF MASSLEE CARL BROMBERG
T 617 443 9292 x213
LBROMBERG@BROMSUN.COM

May 22, 2006

VIA HAND DELIVERY

The Honorable Patti B. Saris
 United States District Clerk for the District of Massachusetts
 John Joseph Moakley Courthouse
 One Courthouse Way
 Boston, MA 02110

Re: *ScanSoft, Inc. v. Voice Signal Technologies, Inc., et al.*
 Civil Action No. 04-10353 (PBS)
 Our File: 02639/00509

Your Honor:

In anticipation of tomorrow's hearing on the Neutral Expert, we enclose ScanSoft's Proposal for Concluding the Neutral Expert Procedure.

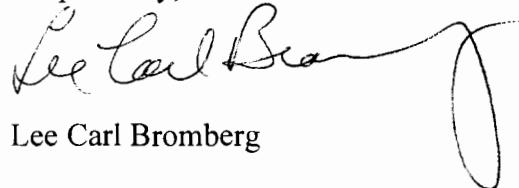
To streamline the procedure and address Prof. Ney's stated concerns about the amount of work involved in reviewing these extremely large speech recognition programs we suggest two steps be taken.

First, that the independent speech recognition experts from each side examine the code pursuant to the Protective Order and report their findings to Prof. Ney, who may then rely upon their reports in preparing his neutral expert report.

Secondly, reduce the demands on Prof. Ney's time by removing the '630 patent issues from his assignment. ScanSoft is willing to waive the protection of a threshold determination on infringement and give an opportunity to VST to conduct whatever further discovery its considers on the '630 patent by July 15, 2006. Meanwhile, ScanSoft will undertake to prepare and file a motion for summary judgment on the '630 patent issues by August 1, 2006.

Honorable Patti B. Saris
United States District Clerk for the District of Massachusetts
May 22, 2006
Page 2

Respectfully,

A handwritten signature in black ink, appearing to read "Lee Carl Bromberg". The signature is fluid and cursive, with "Lee" and "Carl" connected at the top, and "Bromberg" written below it.

Lee Carl Bromberg

LCB/jmc

cc: Robert S. Frank, Esq.
Ms. Christine Patch, Docket Clerk

02639/00509 499020.1